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CLERK'S OFFICE, SOUTHERN DISTRICT OF CALIFORNIA

BY  DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2010 Grand Jury

10CR 4828 LAB

UNITED STATES OF AMERICA,) Case No. 10CR 4828 LAB
Plaintiff,)
v.) I N D I C T M E N T
GEORGE DJURA JAKUBEC,) Title 26, U.S.C., Sec. 5861(f) -
Defendant.) Illegal Manufacture of Destructive
) Devices; Title 26, U.S.C.,
) Sec. 5861(d) - Illegal Possession
) of Destructive Devices; Title 18,
) U.S.C., Sec. 2113(a) - Bank
) Robbery; Title 18, U.S.C.,
) Sec. 2113(a) - Attempted Bank
) Robbery; Title 18, U.S.C.,
) Sec. 924(c)(1)(A)(ii) -
) Brandishing a Firearm in
) Furtherance of a Crime of
) Violence; Title 26, U.S.C.,
) Sec. 5872, 18 U.S.C. Sec. 924(d),
) and Title 28, U.S.C.,
) Sec. 2461(c) - Criminal Forfeiture

The grand jury charges:

Count 1

That on or before November 18, 2010, within the Southern District of California, defendant GEORGE DJURA JAKUBEC did knowingly make firearms, to wit: destructive devices as defined under Title 26, United States Code, Sections 5845(f)(1) and (3), including but not limited to:

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RFM:lml:San Diego
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1 a) nine (9) detonators; and
2 b) thirteen (13) grenade hulls with an unknown quantity of high
3 explosives, including but not limited to Hexamethylene Tiperoxide
4 Diamine (HMTD), Pentaerythritol Tetranitrate (PETN), and Erythritol
5 Tetranitrate (ETN).

6 All in violation of Title 26, United States Code, Sections 5822,
7 5861(f) and 5871.

8 Count 2

9 That on or about November 18, 2010, within the Southern District
10 of California, defendant GEORGE DJURA JAKUBEC did knowingly possess
11 firearms, to wit: destructive devices as defined under Title 26,
12 United States Code, Sections 5845(f)(1) and (3), including but not
13 limited to:

14 a) nine (9) detonators; and
15 b) thirteen (13) grenade hulls with an unknown quantity of high
16 explosives, including but not limited to Hexamethylene Tiperoxide
17 Diamine (HMTD), Pentaerythritol Tetranitrate (PETN), and Erythritol
18 Tetranitrate (ETN);

19 none of which was registered to him in the National Firearms
20 Registration and Transfer Record.

21 All in violation of Title 26, United States Code, Sections 5841,
22 5861(d) and 5871.

23 Count 3

24 On or about November 13, 2009, within the Southern District of
25 California, defendant GEORGE DJURA JAKUBEC, by force, violence and by
26 intimidation, did unlawfully take from the person and presence of an
27 employee of Bank of America, 11190 East Ocean Air Drive, San Diego,
28 California, the sum of approximately \$43,012, belonging to and in the

1 care, custody, control, management, and possession of Bank of America,
2 a bank, the deposits of which were then insured by the Federal Deposit
3 Insurance Corporation (FDIC); in violation of Title 18, United States
4 Code, Section 2113(a).

5 Count 4

6 On or about November 27, 2009, within the Southern District of
7 California, defendant GEORGE DJURA JAKUBEC, by force, violence and by
8 intimidation, did unlawfully attempt to take from the person and
9 presence of an employee of Bank of America, 11190 East Ocean Air
10 Drive, San Diego, California, money belonging to and in the care,
11 custody, control, management, and possession of Bank of America, a
12 bank, the deposits of which were then insured by the Federal Deposit
13 Insurance Corporation (FDIC); in violation of Title 18, United States
14 Code, Section 2113(a).

15 Count 5

16 On or about June 25, 2010, within the Southern District of
17 California, defendant GEORGE DJURA JAKUBEC, by force, violence and by
18 intimidation, did unlawfully take from the person and presence of an
19 employee of Bank of America, 9460 Scranton Road, San Diego,
20 California, the sum of approximately \$1,480, belonging to and in the
21 care, custody, control, management, and possession of Bank of America,
22 a bank, the deposits of which were then insured by the Federal Deposit
23 Insurance Corporation (FDIC); in violation of Title 18, United States
24 Code, Section 2113(a).

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Count 6

2 On or about July 17, 2010, within the Southern District of
3 California, defendant GEORGE DJURA JAKUBEC, by force, violence and by
4 intimidation, did unlawfully take from the person and presence of an
5 employee of Bank of America, 11855 Carmel Mountain Road, San Diego,
6 California, the sum of approximately \$10,400, belonging to and in the
7 care, custody, control, management, and possession of Bank of America,
8 a bank, the deposits of which were then insured by the Federal Deposit
9 Insurance Corporation (FDIC); in violation of Title 18, United States
10 Code, Section 2113(a).

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Count 7

12 On or about November 13, 2009, in the Southern District of
13 California, defendant GEORGE DJURA JAKUBEC did knowingly carry,
14 brandish and use a firearm, that is, one firearm, during and in
15 relation to a crime of violence for which he may be prosecuted in a
16 court of the United States, that is, Bank Robbery; in violation of
17 Title 18, United States Code, Section 924(c)(1)(A)(ii).

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Count 8

19 On or about November 27, 2009, in the Southern District of
20 California, defendant GEORGE DJURA JAKUBEC did knowingly carry,
21 brandish and use a firearm, that is, one firearm, during and in
22 relation to a crime of violence for which he may be prosecuted in a
23 court of the United States, that is, Attempted Bank Robbery; in
24 violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

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FORFEITURE ALLEGATIONS

Upon conviction of the offense alleged in Count 1, defendant
GEORGE DJURA JAKUBEC shall forfeit to the United States, pursuant to
Title 26, United States Code, Section 5872, all firearms and
destructive devices involved in the commission of the offense.

Upon conviction of the offenses alleged in Counts 6 and 7, defendant GEORGE DJURA JAKUBEC shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including but not limited to the following: one Berretta Model 92S 9mm handgun, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

14 DATED: December 2, 2010.

A TRUE BILL:

Per Billeba
Föreperson

19 LAURA E. DUFFY
United States Attorney

By: REES F. MORGAN
REES F. MORGAN
Assistant U.S. Attorney